

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

IN RE: VALSARTAN, LOSARTAN, AND IRBESARTAN PRODUCTS LIABILITY LITIGATION	MDL No. 2875
THIS DOCUMENT RELATES TO ALL CASES	HON. ROBERT B. KUGLER CIVIL NO. 19-2875 (RBK)

**CERTIFICATION OF ADAM M. SLATER IN SUPPORT OF
PLAINTIFFS' OPPOSITION TO ZHP'S MOTION TO SEAL**

ADAM M. SLATER, hereby certify as follows:

1. I am an attorney at law within the State of New Jersey and a partner with the law firm of Mazie Slater Katz & Freeman, LLC, and serve as Plaintiffs' Co-Lead Counsel. I am fully familiar with the facts and circumstances of these actions. I make this Certification in support of Plaintiffs' opposition to Defendants' motion to seal.

2. Attached hereto as **Exhibit 1** is a true and accurate copy of ZHP's patent for its method of synthesizing diovan using TEA.

3. Attached hereto as **Exhibit 2** is a true and accurate copy of ZHP's first patent for its improved method for preparing tetrazole for valsartan using ZnCl₂.

4. Attached hereto as **Exhibit 3** is a true and accurate copy of ZHP's second patent for its method for synthesizing valsartan using ZnCl₂.

5. Attached hereto as **Exhibit 4** is a true and accurate copy of *In re Forest Research Institute, Inc.*, No. 13-1845 (RBK/AMD), 2014 WL 12618100 (D.N.J. June 16, 2014).

6. Attached hereto as **Exhibit 5** is a true and accurate copy of *Centennial Mill by Del Webb Community Association, Inc. v. Ply Gem Holdings, Inc.*, No. 1:17-cv-7675 (NLH/JS), 2018 WL 3085210 (D.N.J. June 22, 2018).

7. Attached hereto as **Exhibit 6** is a true and accurate copy of the Google Translation of Hubaei Saiao Biopharmaceutical Co., Ltd.'s company profile from <https://www.chenhr.com/company/Gcyqq/>.

8. Attached hereto as **Exhibit 7** is a true and accurate copy of *In re Caterpillar Inc., C13 and C15 Engine Prods. Liab. Litig.*, MDL No. 2540, 2015 WL 12830520 (D.N.J. Jan. 29, 2015).

9. Attached hereto as **Exhibit 8** is a true and accurate copy of *Schatz-Bernstein v. Keystone Food Prods., Inc.*, No. 08-3079-RMB-JS., 2009 WL 1044946, at *2 (D.N.J. Apr. 17, 2009).

MAZIE SLATER KATZ & FREEMAN, LLC
Attorneys for Plaintiffs

By: /s/ Adam M. Slater

Dated: September 8, 2023